

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE: : CASE NO. 21-12059
ERIN KATHLEEN HILL : CHAPTER 13
DEBTOR : JUDGE BETH A. BUCHANAN
: TRUSTEE'S OBJECTION
: TO CONFIRMATION

Comes now the Chapter 13 Trustee, Margaret A. Burks and files this objection to the Plan filed by debtor(s). The Trustee objects for the reasons stated herein. Requested documents have not been provided.

- a) Insurance on business.
- b) Action against Professional Business Services, Inc.? Offer to settle claims made to Mr. Noe (see, paragraph 8, above) by debtor's bankruptcy counsel was rejected. If this relationship between Mr. Noe and his company with debtor and her company are not unwound, how will debtor deal with disbursements to members of LLC?

The Trustee requests that the Court uphold her objection.

Respectfully submitted,

/s/ Margaret A. Burks, Esq.
Margaret A. Burks, Esq.
Chapter 13 Trustee
Attorney Reg. No. OH 0030377

Francis J. DiCesare, Esq.
Staff Attorney
Attorney Reg. No. OH 0038798

Tammy E. Stickley, Esq.
Staff Attorney
Attorney Reg No. OH 0090122

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Trustee's Objection to Confirmation was served **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and by first class **mail** on November 10, 2021 addressed to:

Erin Kathleen Hill
debtor
4464 Schoolhouse Road
Batavia, OH 45103

/s/Margaret A. Burks, Esq.
Margaret A. Burks, Esq.
Francis J. DiCesare, Esq.
Tammy E. Stickley, Esq.

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IN RE: : CASE NO. 21-12059
ERIN KATHLEEN HILL : CHAPTER 13
DEBTOR : JUDGE BETH A. BUCHANAN
: **NOTICE OF OBJECTION
TO CONFIRMATION**

The Chapter 13 Trustee, Margaret A. Burks, has filed an Objection to Confirmation of the Plan filed in the above-referenced case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in objection to confirmation, or if you want the court to consider your views on the objection, December 16, 2021, at the United States Bankruptcy Court, Atrium II, Suite 800, 221 East 4th Street, Cincinnati, Ohio 45202.

You may also file a Response explaining your position.

If you mail your response to the court for filing, you must mail it early enough so the court will receive it before the confirmation hearing.

If you file a Response, you must also mail a copy to:

Margaret A. Burks
Chapter 13 Trustee
600 Vine Street
Suite 2200
Cincinnati, Ohio 45202

U.S. Trustee
J.W. Peck Federal Building
550 Main Street, Room 4-812
Cincinnati, Ohio 45202

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the objection and may enter an order granting that relief.

Date: November 10, 2021

/s/Margaret A. Burks, Esq.
Margaret A. Burks, Esq.